

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,
Plaintiff

v

DARRYL YOUNG,
Defendant

)
)
) CRIMINAL ACTION
) NO. 05-40027-FDS
)
)
)

**DEFENDANT, DARRLY YOUNG'S MOTION FOR TRAVEL FUNDS FOR COUNSEL
VISIT**

Now comes the defendant, Darryl Young, and moves this court to authorize the payment of funds for his court-appointed counsel to travel to the Federal Medical Center in Springfield, Missouri to consult with him and his treating physicians . As grounds for this motion, the defendant states as follows:

The defendant has a lengthy history of bipolar disorder, paranoid schizophrenia and suicide attempts. He is currently incarcerated in the Federal Medical Center in Springfield, Missouri where he is receiving treatment and medication for these conditions. This court has previously authorized the payment of funds for a forensic psychological evaluation.

The defendant is currently serving a sentence from the District of Columbia which is due to expire in 2011. The defendant is currently facing a sentence, upon a plea to this offense, of approximately 12 years, under a strict interpretation of the Federal Sentencing Guidelines.

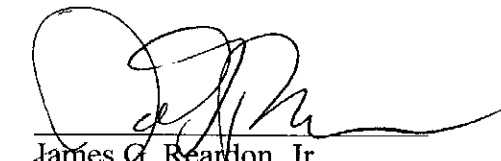
Due to his complex medical/psychiatric history, the various factors to be considered in determining whether to proceed to trial or plead guilty, and the complexity of determining available grounds for seeking a possible sentencing departure, it is necessary that counsel have the opportunity of a face-to-face meeting with Mr. Young and the mental health specialists who have treated and/or evaluated him.

Counsel has been appointed to Mr. Young under the Criminal Justice Act. Counsel has made arrangements to fly from Boston to Springfield Missouri and back on November 13, 2006.

The cost of this round trip flight is \$920.70. Counsel anticipates approximately \$150.00 additional in travel related expenses.

Wherefore, Darryl Young requests that is court approve this motion in the amount of \$1,070.70 to be provided to James G. Reardon, Jr., counsel for Mr. Young, to cover the cost of travel to and from the Federal Medical Center in Springfield, Missouri.

Darryl Young
By his attorney,



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DATED: November 3, 2006